Annual 47 CFR § 64.2009(e) CPNI Certification Template

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017

1. Date filed: 2/27/2018

2. Name of company(s) covered by this certification: Bestline Communications, LP

3. Form 499 Filer ID: 806721

4. Name of signatory: Grant Riemer

5. Title of signatory: Chief Executive Officer

6. Certification:

I, Grant Riemer, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 CFR § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed

STATEMENT OF COMPLIANCE WITH THE FCC'S CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) RULES

Bestline Communications LP d.b.a Bestline, d.b.a Bestline Solutions's (the "Company") operating procedures ensure that the Company is in compliance with the FCC's CPNI Rules because disclosure of, or permitting access to, our customers' CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2011.

The Company has internal procedures in place to educate our employees about CPNI and the disclosure of CPNI. Our employees are instructed that CPNI is information that relates to the quantity, technical configuration, type, destination, location, and amount of use of the telecommunications services subscribed to by any customer of the Company that is made available to us by the customer solely by virtue of our relationship with our customers. This extends to information contained in bills for telephone service, long distance telephone service, and toll service for calls originating on another network. Our employees that have access to this information are aware of the FCC's rules and are prohibited from disclosing or permitting access to CPNI without appropriate customer consent or as allowed by law and the FCC rules. Any employee that discloses CPNI is subject to disciplinary action, and possible termination.

The Company has implemented procedures designed to protect our customers' CPNI. Our policies are consistent and appropriate under 47 C.F.R §64.2010. If our customers' CPNI is used for sales and marketing campaigns, the appropriate safeguards are taken as set forth in 47 C.F.R §64.2009.

The Company's policies are designed to notify both the customer and the relevant legal authorities as defined under 47 C.F.R. §64.2011.

BESTLINE COMMUNICATIONS, LP SUMMARY OF ACTIONS TAKEN AGAINST DATA BROKERS

A. During Calendar Year 2017, the Company has instituted the following proceeding, or filed the following petitions, against data brokers before the Federal Communications Commission:

None

B. During Calendar Year 2017, the Company has instituted the following proceeding, or filed the following petitions, against data brokers before the state commission(s) having jurisdiction over it:

None

C. During Calendar Year 2017, the Company has instituted the following proceeding, or filed the following petitions, against data brokers before the following federal or state courts:

None

BESTLINE COMMUNICATIONS, LP SUMMARY OF CUSTOMER COMPLAINTS REGARDING UNAUTHORIZED RELEASE OF CPNI

A. During Calendar Year 2017, the Company has received the following number of customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper access by Company employees:

None

B. During Calendar Year 2017, the Company has received the following number of customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper disclosure to individuals not authorized to receive the information:

None

C. During Calendar Year 2017, the Company has received the following number of customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper access to online information by individuals not authorized to view the information:

None

D. During Calendar Year 2017, the Company has become aware of the following processes that pretexters are using to attempt to access its CPNI: